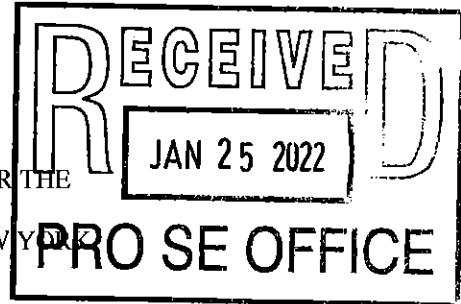


1 Lucio Celli  
2 89 Widmer Road  
3 Wappingers Falls, New York 12590  
4 718-547-9675

5  
6 UNITED STATES COURT FOR THE  
7 SOUTHERN DISTRICT OF NEW YORK



8  
9 LUCIO CELLI,  
10 Appellant/Petitioner/Defendant,  
11 vs.  
12 New York City Department of Education et al,  
13 Appellee/Respondent/Plaintiff

14 Case No.: 21-cv-10455  
15 MOTION FOR FRAUD UP ON THE COURT: BIAS JUDGE

16 Dear Chief Judge Swain,

17 Your Honor was obviously bribed by Randi Weingarten like  
18 Judge Marrero because my injunction had everything to do with  
19 showing the world that I did not receive a fair trial and show  
20 how Judge Engelmayer intimidated me, which are the topic of my  
21 3020-a. I cannot defendant myself without putting a face to  
22 audio recordings of AUSAs

23 I make this motion pursuant to rule 60

24 **Please Take Notice**, Your Honor knows that you are part to the  
25 2d. Cir. Council and there is crystal-clear misconduct in terms  
26 of Judge Engelmayer and Judge Cogan, like practice of law or  
27 depriving me of a fair trial.

28 **Please Take FURTHER Notice**, then there is Your Honor's  
misconduct helping the above-referenced judge get away with  
harming me

MOTION FOR FRAUD UP ON THE COURT: BIAS JUDGE - 1

### Part 1: Biasness Judge

Your Honor was not a neutral arbiter as required by the Due Process Clause of the 5<sup>th</sup> and 14<sup>th</sup> Amendment. According to the 2d. Cir., "fraud on the court will, most often, be found where the fraudulent scheme defrauds the "judicial machinery" or is perpetrated by an officer of the court such that they cannot perform its function as a neutral arbiter of justice. See *Martina Theatres Corp. v. Schine Chain Theatres, Inc.*, 278 F.2d 789, 801 (2d. Cir. 1980)

1. The 3-panel biasness arbitrator came from an injunction and the case in the 2d. Cir., DC37 won theirs on the same grounds
  - a. What is the difference here is the fact Randi paid you to hide her criminal conduct?
  - b. Your Honor brought your office into disrepute and I would be ashamed taking a bribe from Randi to continue to deprive me of my rights
2. Your Honor's decisions twisted (Randi/Marrero connection) that I was trying to litigate my criminal charges vs. I was deprived of a fair trial, and I have audio recordings of Judge Engelmayer and Judge Donnelly intimidating me
3. Your Honor did not even give me a chance to make anything clear via an Amendment because Your Honor knew what I wrote was crystal clear, as congress and the DOJ understood
  - a. Even Judge Cogan wrote the same sentence, but 80 DOJ personnel understood with borderline IQ students
  - b. Be honest and tell the country how much did Randi pay you?
4. Your Honor lied in her decision by saying she did not

Weingarten/Judge Marrero) that I was trying to relitigating the case

5. The case was relitigated and I was showing that I was denied a fair trial, which I have 80 DOJ saying taking my intent away from me is a crime—but, nowhere in your decision does it acknowledge a fact that has been acknowledged by everyone
6. Your Honor knows that Randi paid Mr. Silverman, Judge Donnelly, AUSA Bensing, and AUSA Karamigous to deprive me of retro money because I have AUSAs telling me it is a crime, as they are retaliating against you.

**Please Take Notice**, the case was not litigated in any way on my behalf and Your Honor's decision continues the narrative Randi Weingarten paid for

Sue C.

Lucio Celli

December 30, 2021

Dated this 30<sup>th</sup> of December, 2021.

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2 Lucio Celli, Defendant  
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MOTION FOR FRAUD UP ON THE COURT: BIAS JUDGE - 4